

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In RE:)
Tina M. Kramer)
Debtor.) Case No.: 20-40349 EDK
) Chapter: 13
)

RESPONSE OF DEBTOR TO:

[147] CHAPTER 13 TRUSTEE'S MOTION TO DISMISS

NOW COME Tina M. Kramer, Debtor in the above captioned matter, and respectfully responds to the above captioned as follows:

RESPONSES

- (1) Admit.
- (2) The Debtor admits that there is a plan payment arrears. Although the Debtor is not sure of the arrears balance, the Debtor believes that the arrears as stated by the Trustee is approximately correct. Denied the relief requested.

DISCUSSION

- (3) The Debtor has advised counsel that she intends to make a plan payment of \$1,600 on or about Friday, February 24, 2023.
- (4) Said payment will cure the arrears as alleged by the Trustee.

WHEREFORE, Debtor requests that this Honorable Court:

- a. Deny and overrule the Motion; and
- b. Grant any other relief that is fair and equitable.

Dated: February 15, 2023

Respectfully Submitted by,

Tina M. Kramer,

Through Counsel,

/s/ Robert W. Kovacs, Jr.

Robert W. Kovacs, Jr.

Bar No.: 671497

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Certificate of Service

I hereby certify that, upon information and belief, the above was electronically served via the CM/ECF System of the United States Bankruptcy Court for the District of Massachusetts upon the following CM/ECF Participants:

- United States Trustee
- Standing Trustee
- Lawson Williams for CITIZENS BANK NA f/k/a RBS CITIZENS NA
- Matthew M. Horowitz for Aegis Security Insurance Co.
- Raquelle Kaye for Internal Revenue Service

Manuel Notice List

I further certify that I, on February 15, 2023, have served a copy of the same by first class mail, postage prepaid, on the non CM/ECF participates below.

Tina M. Kramer
26 Pine Street
Medway, MA 02053

Dated: February 15, 2023

Respectfully Submitted by,

/s/ Robert W. Kovacs, Jr.
Robert W. Kovacs, Jr.
Bar No.: 671497